

IN THE UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF OHIO

CRANBROOK MEADOWS  
CONDOMINIUM OWNERS  
ASSOCIATION,

Plaintiff,

v.

ALLSTATE INSURANCE COMPANY,

Defendant.

\* CASE NO. 1:18-CV-02160  
\*  
\* JUDGE CHRISTOPHER A. BOYKO  
\*  
\* JOINT MOTION TO EXTEND NON-  
\* EXPERT DISCOVERY DEADLINES AND  
\* TO CONTINUE SETTLEMENT  
\* CONFERENCE  
\*  
\*  
\*

Plaintiff Cranbrook Meadows Condominium Owners Association and Defendant Allstate Insurance Company jointly move this Court to extend the current May 1, 2019, non-expert discovery deadline and to continue the settlement conference presently scheduled for May 20, 2019 at 2:00 p.m.

For cause, the parties state that they had scheduled a private mediation of this case with Attorney Michael Ungar of Ulmer Berne to occur in Cleveland on April 1, 2019. If the mediation proved to be unsuccessful, four depositions were scheduled to occur on April 2 and 3 in Cleveland and four more were scheduled to occur on April 9, 10 and 11 in Dallas, Texas. Resolution of the case through mediation prior to incurring significant costs to take these necessary depositions was a critical incentive to mediate. Unfortunately, the parties were advised by Mr. Ungar's office that he had to cancel the previously confirmed mediation hearing on April 1 and reschedule it. The parties have reset the mediation with Mr. Ungar for April 9.

Because discovery cost savings are a key incentive to mediate, the parties want to move the previously-scheduled depositions to a date after the mediation. Considering the present schedules of counsel and the witnesses, the depositions cannot occur before mid-May, 2019, and

will likely not be concluded prior to this Court's settlement conference scheduled for May 20, 2019.

For these reasons, the parties ask that this Court extend the non-expert discovery deadline from May 1, 2019 to June 15, 2019, and to continue the settlement conference from May 20, 2019 to a date convenient to the Court after July 1, 2019.

Respectfully submitted,

/s/ Ben Wickert

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Allstate Insurance Company

#### CERTIFICATE OF SERVICE

I hereby certify that on this 19th day of March, 2019, a copy of the foregoing document was filed electronically. Notice of this filing will be sent by operation of the Court's electronic filing system to all parties indicated on the electronic filing receipt. Parties may access this filing through the Court's system.

/s/ Paul D. Eklund

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